

## PROGRAM INTEGRITY REQUEST FOR REGULATION INTERPRETATION

**INSTRUCTIONS:** Complete items 1 -10 of the form. Use a separate form for each policy interpretation request. Retain a copy of the Word Document for your records, and submit via email to: [PIBPolicy@dss.ca.gov](mailto:PIBPolicy@dss.ca.gov).

1. REQUESTOR NAME: Carlos A. Gonzales	5. COUNTY: Marin
2. PHONE NO: (415) 473-7081 EMAIL: <a href="mailto:cagonzales@marincounty.org">cagonzales@marincounty.org</a>	6. SUBJECT: Calculating Overissuance for Out of State
3. REGULATION CITE(S): 7 CFR 273.12(d)	7. REFERENCES: (ACLs/ACINs, COURT CASES Etc.) ACL 12-25E
4. DATE OF REQUEST: 06/01/2017	8. DATE RESPONSE NEEDED: 06/30/2017

### 9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

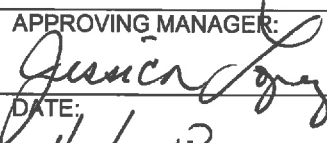
When a client moves to a different state and establishes permanent residency in that state, but the client continues to receive CalFresh benefits because the move happened mid-period - Can an overissuance (OI) be established once independent verification is obtained to confirm the client did in fact move out of California? (i.e. An admission from the client)

### 10. REQUESTOR'S PROPOSED ANSWER:

An Overissuance would be established from the month that the SAR7 was due; client should have reported on the SAR7. If it is a change reporting household, the change would need to be reported 10 days from the date of the move. OI would then occur from the month after their 10 days has expired.

### 11. CDSS RESPONSE:

Based on the scenario provided in the Question, an OI cannot be established for the months after the client failed to report relocation to another state, unless the client failed to report the relocation on their SAR 7 (All County Letter (ACL) 12-25E). ACL 12-25E further clarifies, "Households are only required to report a mid-certification period address change on the periodic report (SAR 7). An OI claim would not be established unless the household did not identify their new address on the SAR 7." An OI can only be established if the client received SNAP and/or TANF benefits from two states at the same time.

PROGRAM INTEGRITY ANALYST: Michael Lee	APPROVING MANAGER: 
DATE: 04/05/2018	DATE: 4/11/2018

DATE RESPONSE RECEIVED/LOG # (CDSS Use Only):

6/22/17 - PI 17-33B

Please note: The policies expressed in this response are based on the unique set of facts presented and should not be presumed to apply in other situations.